

# **EXHIBIT 18**

**Samantha Wolff**

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**From:** Samantha Wolff  
**Sent:** Tuesday, July 11, 2017 9:10 AM  
**To:** 'Tiffany L. Bacon'  
**Cc:** Alison Hurley; Kurt A. Franklin; 'Victor Otten'; Lisa M. Pooley; Ann D. Ghorso  
**Subject:** RE: Lunada Bay - Document production

Tiffany-

Since we spoke, your client (Charlie) testified at his deposition that he has made little effort to obtain his cell phone records (I believe his response to my question about what he's done to obtain his bills was "honestly, not much."). We are now running out of time and we do not have the luxury of waiting for you to "inquire" into imaging their phones. We are also concerned that because your office has waited so long to image the phones, a significant amount of evidence will be unavailable. I have met and conferred with your office a number of times and at this point we simply need to move forward with the call with Magistrate Judge Oliver.

Samantha

**From:** Tiffany L. Bacon [mailto:tbacon@bremerwhyte.com]  
**Sent:** Monday, July 10, 2017 8:59 PM  
**To:** Samantha Wolff <SWolff@hansonbridgett.com>  
**Cc:** Alison Hurley <ahurley@bremerwhyte.com>; Kurt A. Franklin <kfranklin@hansonbridgett.com>; 'Victor Otten' <vic@ottenlawpc.com>; Lisa M. Pooley <lpooley@hansonbridgett.com>; Ann D. Ghorso <aghorso@hansonbridgett.com>; Tiffany L. Bacon <tbacon@bremerwhyte.com>  
**Subject:** RE: Lunada Bay - Document production

Samantha,

My office has never expressed an unwillingness to produce documents. On the contrary, when we spoke last week, I informed you attempts have been made to obtain records from our clients' phone company with no success to date. I also informed you we would inquire into imaging the data on our clients' cell phones, which we still intend on doing.

I was unable to respond to you today because, as you know, Mr. Otten was taking my client's deposition, which I was defending. I ask that you withdraw the request for a call with Magistrate Judge Oliver and that we further meet and confer on this issue.

**Tiffany L. Bacon**

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**S O L U T I O N S**

**From:** Samantha Wolff [<mailto:SWolff@hansonbridgett.com>]  
**Sent:** Monday, July 10, 2017 11:09 AM  
**To:** Tiffany L. Bacon  
**Cc:** Alison Hurley; Kurt A. Franklin; 'Victor Otten'; Lisa M. Pooley; Ann D. Ghiorso  
**Subject:** Lunada Bay - Document production

Tiffany,

I'm checking back in on Charlie and Frank Ferrara's cell phone bills and text messages. I had hoped to hear from you by the end of last week regarding whether or when we could expect production of this information. Since it seems your clients are unwilling to produce these documents, I will call the Magistrate's clerk and ask for a hearing date this week. I'll let you know what dates/times are available.

Samantha

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